

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING AND DEVELOPMENT,	§	Civil Action No.: 6:21-cv-00153-ADA
	§	Civil Action No.: 6:21-cv-00154-ADA
	§	Civil Action No.: 6:21-cv-00155-ADA
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
NETGEAR, INC.,	§	
Defendant.	§	
	§	

JOINT CASE READINESS STATUS REPORT

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant NETGEAR, Inc. (“NETGEAR”) hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILINGS AND EXTENSIONS

Plaintiff WSOU filed a complaint in each of the above-numbered cases on February 19, 2021. There has been one extension for a total of 30 days.

RESPONSES TO THE COMPLAINTS

In lieu of answering Plaintiff WSOU’s complaints, on April 15, 2021, Defendant NETGEAR moved to dismiss for improper venue, or, in the alternative, to transfer to the Northern District of California in each of the above-numbered cases. *See* Case No. 6:21-cv-00153, Dkt. 19; Case No. 6:21-cv-00154, Dkt. 17; and Case No. 6:21-cv-00155, Dkt. 17.

PENDING MOTIONS

On April 15, 2021, in each of the above-numbered cases, Defendant NETGEAR filed a motion to dismiss for improper venue, or, in the alternative, to transfer to the Northern District of California. *See* Case No. 6:21-cv-00153, Dkt. 19; Case No. 6:21-cv-00154, Dkt. 17; and Case No. 6:21-cv-00155, Dkt. 17.

There are no other pending motions.

RELATED CASES IN THIS JUDICIAL DISTRICT

The above-numbered cases were all filed by Plaintiff WSOU against Defendant NETGEAR in this District. There are no known related cases.

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff WSOU has asserted one patent in each case. Plaintiff WSOU has not yet identified the number of asserted claims, although it asserted one claim in each Complaint. Plaintiff WSOU has not yet served its preliminary infringement contentions.

APPOINTMENT OF TECHNICAL ADVISER

Plaintiff WSOU requests a technical adviser to be appointed to the case to assist the Court with claim construction or other technical issues. Defendant NETGEAR, at this time, does not believe a technical adviser is needed, but will support the involvement of one if the Court decides it would like to engage assistance of a technical adviser.

MEET AND CONFER STATUS

Plaintiff WSOU and Defendant NETGEAR conducted a meet & confer conference for the above-numbered cases on April 21, 2021. The parties raise the following pre-*Markman* issues:

Venue Discovery. Plaintiff WSOU plans to seek jurisdictional discovery pursuant to the Court's Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases.

Protective Order. The parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming weeks.

The parties currently have no other pre-*Markman* issues for discussion at the CMC.

Date: April 22, 2021

Respectfully submitted,

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